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In the matter of Termination)
of Exemption of Citizens Utilities)
Rural Company, Inc. pursuant to)
Section 251(f)(1)(B) of the)
Telecommunications Act)

Docket NO. T-01954B-05-0852

**OPENING BRIEF OF AUTOTEL IN RESPONSE TO
DECEMBER 12, 2005 PROCEDURAL ORDER**

In accordance with Administrative Law Judge Amy Bjelland's December 12,
2005 Procedural Order in this docket, Autotel submits the following:

**Issue No 1: Whether Autotel is precluded from filing the application in this
docket due to its pending appeal in Docket No. 67273?**

47 USC 251(f)(1)(B) states: The party making a bona fide request of a rural
telephone company for interconnection, services, or network elements shall

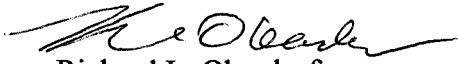
submit a notice of its request to the State commission.” Citizens asserts its operating company, Citizens Utilities Rural Company, Inc., is a rural telephone company as defined in 47 USC 153. Autotel has requested interconnection, services, and network elements from Citizens Utilities Rural Company, Inc. Autotel is required by law to file the Notice of that request with the Arizona Commission.

Issue No. 2: Is it rational or necessary to terminate Citizens’ exemption under the Act with regard to the requested Interconnection Agreement?

If Citizens Utilities Rural Company, Inc. is not a rural telephone company as defined in 47 USC 153, then there would be no need to continue with a proceeding to terminate Citizens’ exemption. It would make sense for the Commission to make a determination as to whether Citizens Utilities Rural Company, Inc. qualifies as a rural telephone company under the Act early in this proceeding. Autotel believes Citizens Utilities Rural Company, Inc. is not a rural telephone company because it serves an incorporated place of 10,000 inhabitant or more.

If Citizens Utilities Rural Company, Inc. is a rural telephone company, 47 USC 251(f)(1)(B) requires the Commission to terminate the exemption within 120 days if the request is not unduly economically burdensome, is technically feasible and is consistent with section 254. Since either party may petition for arbitration from the 135th to the 160th day, it is crucial to the success of the negotiations that the Commission issue its Order in this proceeding within the statutory time limit.

Respectfully submitted this 6th day of January, 2006

A handwritten signature in black ink, appearing to read "R. Oberdorfer", with a long horizontal flourish extending to the right.

Richard L. Oberdorfer

Autotel

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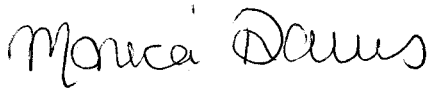
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oberdorfer@earthlink.net

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the Autotel's Opening Brief in Response to December 12th, 2005 Procedural Order was sent via First Class Mail on January 5, 2006:

Kevin Saville
Associate General Counsel
2378 Wilshire Blvd.
Mound, MN 55364

A handwritten signature in cursive script that reads "Monica Davis".

Monica Davis
Office Manager